

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CBV, INC.,

*Plaintiff/Counterclaim-
Defendant,*

v.

CHANBOND, LLC,

*Defendant/Crossclaim-
Defendant,*

DIERDRE LEANE, and IPNAV, LLC,

*Defendants/Counterclaim-
Plaintiffs/Crossclaim-
Plaintiffs.*

C.A. No. 1:21-cv-01456-MN

**STIPULATION AND [PROPOSED] ORDER REGARDING
PRELIMINARY INJUNCTION BRIEFING**

WHEREAS, Plaintiff/Counterclaim-Defendant CBV, Inc. (“CBV”), Defendant/Crossclaim-Defendant ChanBond, LLC (“ChanBond”), and Defendants/Counterclaim-Plaintiffs/Crossclaim-Plaintiffs Deirdre Leane and IPNAV, LLC (“Leane Defendants”) are parties to this action (collectively, the “Parties”); and

WHEREAS, CBV has filed a motion for a preliminary injunction restraining ChanBond from distributing the proceeds of ChanBond’s patent litigations referenced in CBV’s Amended Complaint (the “Complaint”) to the Leane Defendants (the “PI Motion”); and

WHEREAS, the Parties stipulated to an Order Concerning Temporary Restraining Order and Interest by CBV, Inc., pending hearing and decision on the PI Motion; and

NOW, THEREFORE, the Parties hereby stipulate and agree as follows:

1. ChanBond and Leane Defendants shall file and serve their Answering Briefs in opposition to CBV's PI Motion on or before March 31, 2022;

2. CBV shall serve a limited, expedited request for production of documents "relating to any effort by Defendants to disclose the existence or terms of the ASA to, or conceal the existence or terms of the ASA from CBV" (the "Expedited Document Requests") on or before March 31, 2022;

3. CBV shall file and serve its Reply Brief in further support of its PI Motion the within seven (7) days of Leane Defendants' completion of its production of documents in connection with the Expedited Document Requests, and the hearing on the PI Motion shall be scheduled by the Court without regard to the status of ChanBond's production of documents in connection with the Expedited Document Requests.

4. Nothing herein shall prevent or waive CBV's right to move to compel further production of documents based on any deficiency in ChanBond's and/or Leane Defendants' responses to the Expedited Discovery Requests and/or production of documents in connection therewith, or to request from the Court an extension of time to file and serve its Reply Brief based upon the time required for Defendants to respond to the Expedited Document Requests and produce documents in connection therewith, and nothing herein shall prevent or waive Defendants' right to oppose such motion or request on the basis that the Expedited Discovery Requests are irrelevant, unnecessary to resolution of the PI Motion, lack sufficient basis to warrant grant of expedited discovery in connection with a PI Motion, or on any other ground;

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**BUCHANAN INGERSOLL
& ROONEY PC**

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*Attorneys for Deirdre Leane and IPNAV,
LLC*

Dated March 31, 2022.

IT IS SO ORDERED.

The Honorable Maryellen Noreika
United States District Judge